

**Jacob Cruz Pro Se,  
165 South Gabgab Court  
Liguan Terrace, Dededo Guam 96929-5501.U.S.A.  
671-735-5602**

**FILED**  
DISTRICT COURT OF GUAM

OCT 12 2006

**MARY L.M. MORAN**  
CLERK OF COURT

**Plaintiff**  
**Jacob Cruz**

**IN THE UNITED STATES DISTRICT COURT  
OF GUAM**

**JACOB CRUZ**  
**PLAINTIFF**

**Case Number : 06-00031**

**Civil Case**

**Compliant Title I A.D.A. of 1990**

**Discrimination / Breech of**

**Contract.**

**Vs.,**

**Gregorio Salas Calvo in his  
Official Capacity as Deputy Director  
Department of Integrated Services for Individuals with Disabilities (DISID)/**

**Mrs. Rosanne S. Ada in Her Official Capacity as Director of the Department of Integrated Services for  
Individuals with Disabilities (DISID).**

**Defendants.**

**COMES NOW, Plaintiff, JACOB CRUZ, and for his Compliant against the Defendants states as  
follows"**

**Count 1-TITLE I (DISCRIMINATION)**

- 1. This court has jurisdiction of Title I claims pursuant to the Civil Rights Act of 1964 this action arises under the constitution and the laws of the United States. Plaintiff is alleging violation of his rights under TITLE I of the Civil Rights act of 1964, Section 504 of the Rehabilitation Act of 1973 as amended through 1998, and the Americans with Disabilities Act(ADA) of 1990, no Individuals Seeking Vocational Rehabilitation will be subject to discrimination on the grounds of national origin, color, creed, sex, or disability.**

**ORIGINAL**

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*Venue herein is proper under 28 U.S.C. §1391 and 42 USC §2000. at all times mentioned herein, and upon information and belief, Defendant(S) Rosanne S. Ada in her Official Capacity as Director of Department of Integrated Services For Individuals With Disabilities (DISID), / Gregorio Salas Calvo in his Official Capacity as Deputy Director of DISID. Was and are Employee's of DISID a Government entity organized and existing under the laws of and in the Territory of Guam, as a Territory of the United States of America and pursuant to the Organic Act of Guam, and has its principal place of business in Guam.*

- 2. At all times mentioned herein, and upon information and belief, Defendant(S) Department of Integrated Services For Individuals With Disabilities (DISID), was and is a Government Service Provider for Individuals with Disabilities and its principal business in Guam.*
- 3. At all times mentioned in this compliant Plaintiff was a resident of Guam and was seeking services by the Defendant(s) Agency.*
- 4. Plaintiff is and Individual with a Disability, and is a Male.*
- 5. On or about April 2006 Plaintiff was seeking services from the Defendant(s) agency thru The Individualized Budgeting Program (I.B.P.) Plaintiff was Discriminated against on the basis of his Disability Status.*

6. *The Deputy Director had Promised the Plaintiff that just give them time and the Plaintiff will get \$90,000 to begin plaintiff's Small Home-Based Business, and be self- Sufficient.*
7. *The Defendant had met with Plaintiff informally over a Period of 8 Particular Times. At Which Defendant had committed and promised that The Individualized budgeting upon it's receiving the Funding will disburse the Funds to the Plaintiff.*
8. *On or about July 14, 2006 Plaintiff Mr. Cruz was Promised By Defendant Gregorio Salas Calvo that He The (Plaintiff) will Qualify Under The Individualized Budgeting Program and Will Get Housing as Part of His Academic Training To Further his Studies For One Semester Here in Guam at The Guam Community College. Along with His Individualized Budgeting Program his Individualized Plan For Employment With The Division of Vocational Rehabilitation Will Go Hand In Hand. (DVR) is under the Umbrella of DISID. And services for the Individualized Budgeting Program is a Locally Funded Program whereas the DIVISION OF VOCATIONAL REHABILITATION SERVICES ARE HALF and HALF FUNDED BY THE STATE AND FEDERAL GOVERNMENT.*

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9. *and that Services Thru The Individualized Budgeting Program To Include Housing, Furnishing, and Other Needs also To Include some funding for the Plaintiff's Home-Based Business Will Be Included. Gregorio Salas Calvo stated that Instead of \$20.000 he will give The Plaintiff Mr. Cruz \$90.000 Under the Individualized Budgeting Program. And All Plaintiff's Services Will Kick In On or About August 16, 2006.*
10. *I had another conversation with the Defendant on Wednesday August 23<sup>rd</sup>, 2006. To inquire what is happening why my Individualized Budgeting program funding not in place. Gregorio S. Calvo Stated That He was having some problems and just gives them some time. At the same time my Individualized Plan for Employment should be In Place Shortly.*
11. *September 2006 came and went No Response. Gregorio Salas Calvo Was Never in The Office. And Never Responded to my E-mails. But One.*
12. *I had asked For a Grievance Hearing on October 6, 2006(Friday). To air out my Concerns. In this Meeting Which Was Held at the DISID DIRECTOR'S OFFICE PRESENT Were Plaintiff, Defendant's GREGORIO SALAS CALVO DEPUTY DIRECTOR(DISID),/ ROSANNE S.ADA DIRECTOR(DISID) and Fred Burgos (At The Request of Plaintiff), and Mr. Edmund Cruz Advocate.*

**13. Rosanne S. Ada Director of Department of Integrated Services For Individuals With Disabilities has Consistently Delayed The Division of Vocational of Rehabilitation From Providing Services. She Has Not Signed Off On Authorization's So DVR Can Purchase Client's Laptop Computer Dell M90 From Dimensions Systems, All In One Printer From Sanford Technologies, and Clients Maintenance Fee in the Amount of \$600.00 To Include The Months of August, September, October & November. And \$150.00 thereafter.**

**14. Furthermore it was Stated Verbally By Gregorio Salas Calvo DISID Deputy Director That "HE WILL PROVIDE" AN ICONNECT CELL PHONE PLUS SERVICES, This Was Stated Verbally. To Date Nothing has Been Received.**

15. *In this meeting this was the first time Plaintiff was handed Down a Decision of Disqualifying him From the Individualized Budgeting Plan (IBP), and the Defendants Showed No Remorse. In a Score From 1-110, Plaintiff Scored a 5.*
16. *As proximate result of the aforementioned acts of cruel Lies and Discrimination Plaintiff Suffered Outrage Shock, Humiliation, Emotional/ Mental Trauma / Stress.*
17. *School is already pass Mid-Term, and None of These Services have Yet To Be Delivered, By Either DISID or DVR.*

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**Relief Sought:**

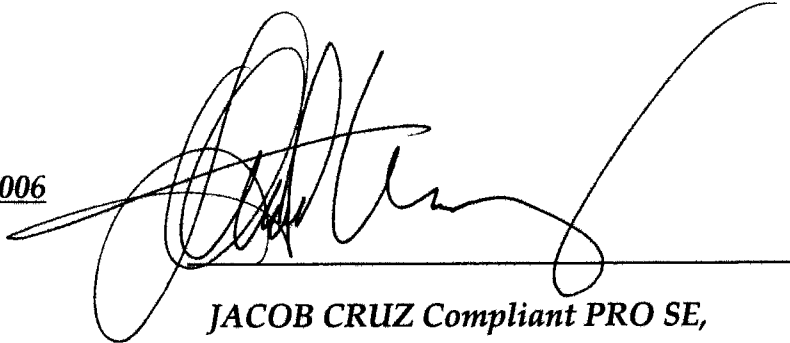
- ***Court Fee's To be Paid By Rosanne S. Ada In Her Official Capacity as Director of Department of Integrated Services For Individuals With Disabilities, (DISID).***
- ***Compensate Mr. JACOB CRUZ In The Amount of Four Million Six Hundred Thousand Dollars (\$4600.000.00) excluding Taxes. Taxes will be paid by the Department of Integrated Services For Individuals With Disabilities (DISID)***
- ***Garnishment of Salaries of Mrs. Rosanne S. Ada Director of DISID, Mr. Gregorio Salas Calvo Deputy Director of DISID, and DISID DIRECTOR'S OFFICE STAFF until Plaintiff is Paid In Full.***
- ***I Maga'Lahi Guahan to Redirect Mrs. Rosanne S. Ada Director of DISID and Mr. GREGORIO SALAS CALVO to A Non- Managerial Position...***

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PRAYER

*WHEREFORE, Plaintiff prays that Judgment be entered in his favor and against each Defendant(s) and that the Plaintiff be awarded all relief available to him under the law and statutes, Including Personal Injuries, Emotional and Mental Trauma, Outrage Shock, Humiliation, Stress, and for such other further relief as this Honorable Court Deems Just and Proper.*

Dated: 12<sup>th</sup>, October 2006



A handwritten signature in black ink, appearing to read 'Jacob Cruz', is written over a horizontal line. The signature is stylized with large loops and a long horizontal stroke extending to the right.

JACOB CRUZ Compliant PRO SE,